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July 22, 2025

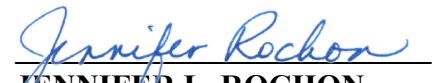
Via ECF

The Honorable Jennifer Rochon
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 20B
New York, New York 10007

The requested adjournment is GRANTED. The initial pretrial conference is adjourned to **September 26, 2025 at 10:00 a.m.**

Date: July 22, 2025
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

**RE: *De Sousa v. Republica Bolivariana de Venezuela et al*,
No. 1:25-cv-03341-JLR**

Dear Jennifer Rochon:

We represent plaintiff, Joao Dionisio De Sousa (“Plaintiff”), in the above referenced matter against defendants República Bolivariana De Venezuela (“Venezuela”), Fondo De Protección Social De Los Depósitos Bancarios f/k/a Fondo De Garantía De Depósitos Y Protección Bancaria (“FOGADE”), and in rem defendant \$6,000,000 (the “In Rem Defendant” and, together with Venezuela and FOGADE, “Defendants”). We write seeking an adjournment of the initial pretrial conference, scheduled for July 29, 2025 at 3:00 p.m. (the “Conference”) and the corresponding deadlines to file the joint letter and proposed Civil Case Management Plan and Scheduling Order referenced in Your Honor’s Notice of Initial Pretrial Conference (ECF No. 14).

The basis for this request is that Defendants have not yet appeared. Plaintiff served FOGADE and the In Rem Defendant on June 6, 2025, pursuant to 28 U.S.C. § 1608(b)(3)(C) (ECF Nos. 23-24), and initiated service upon Venezuela through diplomatic channels in accordance with 28 U.S.C. § 1608(a)(4) (ECF No. 25). To date, FOGADE and the In Rem Defendant have neither appeared nor contacted Plaintiff regarding the Conference. As such, we have been unable to obtain their position on this adjournment request.

Plaintiff respectfully requests that the Conference be adjourned to September 23, 2025. Under 28 U.S.C. § 1608(d), FOGADE and the In Rem Defendant are required to respond to the Complaint within 60 days of service—by August 5, 2025. Service on Venezuela, however, is not complete, as the Clerk of Court has not received a diplomatic note from the U.S. Department of State, which is required to effect service under § 1608(a)(4). Plaintiff is hopeful that Venezuela’s time to appear will have commenced and possibly elapsed by the proposed adjourned date. This is Plaintiff’s first request for an adjournment.

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We thank Your Honor for your consideration of this request.

Respectfully submitted,

WHITE AND WILLIAMS LLP

A handwritten signature in black ink, appearing to read "Thomas E. Butler", with a long horizontal flourish extending to the right.

Thomas E. Butler

cc: All attorneys of record via ECF